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FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 99NF-06
DATE ACTIVATED: 5/28/99

STAFF MEMBERS: Mark R. Allen
David Austin

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Society of Independent Gasoline Marketers of America
Political Action Committee and Thomas L. Robinson, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on April 22, 1999. The basis for the attached referral is the failure of the Society of Independent Gasoline Marketers of America Political Action Committee and Thomas L. Robinson, as treasurer, ("Respondents") to file a 1998 Year End Report of Receipts and Disbursements.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Commission find reason to believe the Respondents violated 2 U.S.C. § 434(a)(4)(A)(i).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY


99. PM. 3.33. 17.00

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Society of Independent Gasoline Marketers of America Political Action Committee and Thomas L. Robinson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, proposed Conciliation Agreement and the appropriate letter.

Lawrence M. Noble
General Counsel

6/9/99
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement